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3 Social Security Administration
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5 San Francisco, California 94105
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8 Attorneys for Defendant

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**
12 **LAS VEGAS DIVISION**

13	ROBIN P. POGUE,)	Case No: 2:17-cv-00251-APG-GWF
14)	
	Plaintiff)	
15)	STIPULATION FOR EXTENSION OF
	v.)	TIME TO FILE DEFENDANT'S CROSS
16)	MOTION TO AFFIRM
	NANCY A. BERRYHILL, Acting)	
17	Commissioner of Social Security,)	(First Request)
)	
18	Defendant.)	
19)	

20 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security, hereby requests
21 an extension of time of thirty days from July 3, 2017 to August 2, 2017, to prepare and file her
22 cross motion to affirm. This is the Commissioner's first request for an extension.

23 Defendant respectfully requests this extension of time because of an extremely heavy
24 workload, and because of upcoming planned leave to help the undersigned's brother move to
25 Oklahoma City. The Commissioner apologizes for the additional delay in proceedings.

1 On June 28, 2017, Plaintiff informed Defendant by email that he had no objection to this
2 extension.

3
4 Respectfully submitted,

5 Date: June 30, 2017

LAW OFFICES OF LAWRENCE D. ROHLFING

6 By: /s/* Cyrus Safa
7 CYRUS SAFA
8 *authorized by email June 28, 2017

9 Attorneys for Plaintiff

10 Date: June 30, 2017

DANIEL G. BOGDEN
United States Attorney

11 By: /s/ Michael K. Marriott
12 MICHAEL K. MARRIOTT
13 Assistant Regional Counsel

14 Attorneys for Defendant

15 Of Counsel
16 Jeffrey Chen
17 Assistant Regional Counsel
18 Social Security Administration

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20 IT IS SO ORDERED.

21
22 DATE: July 5, 2017


HONORABLE GEORGE FOLEY, JR.
United States Magistrate Judge

1 **CERTIFICATE OF SERVICE**

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3 I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time

4 to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

5 Cyrus Safa
6 Law Offices of Lawrence D. Rohlfing
7 12631 E. Imperial Highway, Suite C-115
8 Santa Fe Springs, CA 90670

9 Leonard H Stone
10 Shook & Stone Chtd.
11 710 S. Fourth St.
12 Las Vegas, NV 89101

13 Date: June 30, 2017

DANIEL G. BOGDEN
United States Attorney

14 By: /s/ Michael K. Marriott
15 MICHAEL K. MARRIOTT
16 Assistant Regional Counsel

17 Attorneys for Defendant

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